

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Amateur Radio)	
Service Rules to Provide for changes)	
to section 97.119, Station Identification)	RM-11347
)	
To: The Commission)	

COMMENTS TO THE PETITION

I disagree with the above referenced petition ("the Petition") filed by Mr. Glen E. Zook, Amateur Radio station K9STH, in all respects.

I joined the ranks of Amateur Radio licensees in 1959, and have been licensed continuously since that time. I have held an Amateur Extra Class operator license since August, 1976.

Mr. Zook offers his point of view which says that users of the amateur radio service are somehow unable to effectively identify their station, according to the rules described in section 97.119 of the current FCC rules. He further offers the implied opinion that requiring amateur stations to identify their own station as well as the station(s) with whom they are in contact will somehow correct these problems. I disagree.

The purpose of the station identification requirement contained in FCC rules Part 97, section 119, is to insure that each and every amateur radio

station identifies itself. There can be no reason for a station to identify a station other than itself. In the event that 3 (or 30, or 300, or more) stations are participating in a common communications event, for example, a "net" operation, requiring each station to repeat the identification(s) of each of the other participants could soon become an unmanageable situation, one which would have the potential to consume an inordinate amount of the available time.

The current rule which requires an amateur station to identify itself, and itself alone, at specific intervals and at certain other times, is sufficient for FCC enforcement personnel to accomplish their mission. The addition of a requirement for amateur radio operators to identify their own transmissions as well as those of other stations would only add to the confusion as to which station was being identified, and in fact make the job of the FCC's enforcement personnel more difficult, rather than easier.

SUMMARY

I do not favor adopting this petition, and believe doing so would not be in the best interests of the amateur radio community. There appears to be no significant value added to the service by the adoption of this petition, and I urge the commission to reject the application.

Respectfully submitted,

James B Wiley
Amateur station KL7CC

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